



James L. Eggert
Fire Chief

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**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of)
)
Amendment of Part 90 of the Commission Rules) WP Docket No. 07-100
)

**COMMENTS OF THE VILLAGE OF RIVER FOREST, ILLINOIS FIRE
DEPARTMENT**

I. INTRODUCTION

The Village of River Forest, Illinois Fire Department provides these comments regarding the above captioned matters addressed in the Notice of Proposed Rulemaking, FCC 07-85, adopted by the Commission on May 9, 2007.

II. DISCUSSION

The Village of River Forest, Illinois is situated near the western border of Chicago. The River Forest Fire Department is a full time operation serving a mostly residential village. The River Forest Fire Department is an original member of Division 11 of the statewide Mutual Aid Box Alarm System (MABAS). Division 11 is made up of seven fire departments serving the communities of Berwyn, Cicero, Forest Park, North Riverside, Oak Park, River Forest and Stickney. The River Forest Fire Department would like to offer the following comments regarding this NPRM.

Paragraph 4. The fire service in Illinois has a long history of using paging on the voice channels. This is certainly the case for the River Forest Fire Department. The River Forest Fire Department uses paging on their primary voice channels, which are shared by multiple departments for their day to day emergency operations. This is done for alerting primary responding units, alerting auto and mutual aid units, alerting on duty personnel to

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return from various duty related non-emergent assignments and for making announcements of interest to the department or for our personnel. Eliminating or restricting the use of paging on the voice channels would be detrimental to our department as well as the others sharing our common frequency. The FCC acknowledges that “paging and voice operations can generally co-exist on

the same channel in the same area, provided the paging transmissions are infrequent (low traffic volume) and the paging licensee monitors the channel prior to transmitting.” Loss of this paging capability would be a financial burden for us to bear to implement another method for our alerting needs. It would also delay our responses when personnel are out of quarters.

Paragraph 5. The fire service in Illinois has a long history of using paging on the voice channels. MABAS has designated two primary VHF voice channels (154.265 MHz and 154.3025 MHz) for statewide interoperable communications for mutual aid purposes. The primary means of alerting fire departments state wide of a mutual aid emergency is using paging tones on these frequencies. Every increase in alarm and even the striking out of the box or extra alarm incidents is preceded by the activation of the statewide tones on the voice channel. Eliminating or restricting the use of paging on the voice channels would be detrimental to the fire service in Illinois. The FCC acknowledges that “paging and voice operations can generally co-exist on the same channel in the same area, provided the paging transmissions are infrequent (low traffic volume) and the paging licensee monitors the channel prior to transmitting.” The loss of the paging capability would be devastating to a mutual aid system that has continued to grow since its inception in 1969, to where it is expanding into surrounding states (Wisconsin, Indiana and Iowa). There is no simple solution to replace this tried and true method of alerting the hundreds of fire departments across this state in the event of an emergency that out strips any one department’s capacity to handle. It would be a serious financial burden on the departments of Division 11 to implement some other resource to replace the paging system that we now use so effectively.

Paragraph 6. The fire service in Illinois has a long history of using paging on the voice channels. This is done for alerting our primary responding units, alerting auto and mutual aid units, alerting on duty personnel to return from various duty related non-emergent assignments, and making announcements of interest to our stations or personnel. Eliminating or restricting the use of paging on the voice channels would be detrimental to our department.

Paging on mutual aid frequencies in Illinois is critically important and should be maintained as an option on the voice channels. The Illinois Fire Service has a state-wide fire mutual aid system that uses a common frequency (154.265 MHz and 154.3025 MHz)) which uses radio frequency paging for notification of alarm activation and units due to respond. MABAS is recognized as a model for fire service mutual aid and is being copied by other states to facilitate the sharing of resources for fire and rescue emergencies. As a member of MABAS Division 11 the River Forest Fire Department feels that the implementation of any restrictions would be detrimental to the existing departments and stifle the growth of the very valuable mutual aid system and the interoperable radio system that has been put in place. The elimination or restriction of paging on the mutual aid frequencies would severely impact this operation across the state of Illinois and other surrounding states. Any restrictions would be a serious impact on the current MABAS operations. It would also cause a financial hardship to find and put into service another method of alerting hundreds of departments across the State of Illinois and other neighboring states that are implementing the MABAS program.

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IV. CONCLUSION

The Village of River Forest Fire Department is opposed to any restrictions that might be imposed on the local or mutual aid VHF frequencies as described above.

Respectfully Submitted,

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